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October 3, 2016

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 2203
New York, NY 10007

Re: *Laspatas DeCaro Studio Corp. v. Rimowa GmbH, et al.*, No. 16-cv-0934(LGS)

Dear Judge Schofield,

We represent Third-Party Defendant Meiré GmbH & Co. KG d/b/a Meiré and Meiré (“Meiré”) in the above-referenced action. Together with counsel for Third-Party Plaintiffs Rimowa GmbH, Rimowa Distribution Inc., and Rimowa Inc. (“Rimowa”), we respectfully submit this joint letter with a Proposed Scheduling Order for Meiré’s response to Rimowa’s First Amended Third-Party Complaint and Rimowa’s response to any motion to dismiss Meiré may file.

On September 16, 2016, Rimowa filed its First Amended Third-Party Complaint in this action (Dkt. No. 56). In accordance with this Court’s Rules III.B.4 and III.C.2 and Federal Rule of Civil Procedure 15, Meiré’s deadline to answer the First Amended Third-Party Complaint, file a new motion to dismiss Rimowa’s First Amended Third-Party Complaint, or inform this Court that Meiré’s Motion to Dismiss should proceed as previously submitted is October 7, 2016.

In light of new facts alleged in Rimowa’s First Amended Third-Party Complaint, and due to ongoing employee travel and resulting availability limitations, the parties have agreed, and respectfully request this Court’s consent, to a fourteen (14) day extension of Meiré’s original October 7, 2016 deadline.

With this extension, Meiré will have until October 21, 2016 by which to respond to Rimowa’s First Amended Third-Party Complaint. Should Meiré respond to Rimowa’s First Amended Third-Party Complaint by renewing its motion to dismiss or by filing a new motion to

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dismiss, the parties further have agreed to the following briefing schedule for any such motion to dismiss, subject to this Court's approval:

- Rimowa will file its response to Meiré's motion to dismiss no later than twenty-one (21) days after Meiré files the motion to dismiss;
- Meiré will file its reply no later than fourteen (14) days after Rimowa files its response to Meiré's motion to dismiss; and
- The fully submit date for this motion will be the day after Meiré files its reply in support of its motion to dismiss.

If this proposed extension and briefing schedule meets with the Court's approval, please endorse the attached, proposed scheduling order. We are available to discuss at the Court's convenience.

Respectfully submitted,

/s/ Sabina A. Vayner

Sabina A. Vayner (*admitted pro hac vice*)

Lisa Pearson (LP4916)

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